

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESale PRICE
LITIGATION

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)
) MDL No. 1456
) Civil Action: 01-CV-12257-PBS
)

THIS DOCUMENT RELATES TO THE
AMENDED MASTER CONSOLIDATED
CLASS ACTION

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) Hon. Patti B. Saris
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**MOTION BY DEFENDANT AMGEN INC. FOR
ADMISSION OF COUNSEL *PRO HAC VICE***

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts and Paragraph 16 of Case Management Order No. 1, the undersigned counsel on behalf of Amgen Inc. ("Amgen") respectfully moves the Court to grant Kelleen McGinnis Scott leave to appear and practice in this Court *pro hac vice*. As grounds for this motion, Amgen states as follows:

1. Frank A. Libby, Jr. and Douglas S. Brooks, attorneys at Kelly, Libby & Hoopes, P.C., are members in good standing of the Bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and of the Bar of the United States District Court for the District of Massachusetts. Mr. Libby and Mr. Brooks have filed appearances in these actions.

2. Ms. Scott is an attorney with the law firm of Hogan & Hartson LLP, 555 Thirteenth Street, N.W., Washington, DC 20004.

3. Ms. Scott is not a member of the Massachusetts Bar or the Bar of the United States District Court for the District of Massachusetts.

4. Ms. Scott has met the requirements to practice in the United States District Court for the District of Massachusetts and has executed a Certificate in accordance with Local Rule 85.5.3. *See* Certificate of Kelleen McGinnis Scott (Exhibit A).

WHEREFORE, Defendant Amgen respectfully requests that this Court grant this motion to admit Kelleen McGinnis Scott, *pro hac vice*.

Respectfully submitted,
Defendant Amgen Inc.
By its attorney,

/s/Frank A. Libby, Jr.
Frank A. Libby, Jr. (BBO #299100)
Douglas S. Brooks (BBO #636697)
Kelly, Libby & Hoopes, P.C.
175 Federal Street, 8th Floor
Boston, Massachusetts 02110
Tel: 617-338-9300
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Dated: December 20, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion By Defendant Amgen Inc. for Admission of Counsel *Pro Hac Vice* were delivered to all counsel of record by electronic service pursuant to Case Management Order No. 2, by sending on December 20, 2005, a copy to LexisNexis File & Serve by electronic transmission for posting and notification to all parties.

A handwritten signature in black ink, consisting of a stylized 'J' followed by a horizontal line.